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January 23, 2003

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
Room TW-A325  
The Portals, 445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Re: Request for Extension of Time (*In the Matter of Federal-State Joint Board on Universal Service, et al.*, CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170)**

Dear Ms. Dortch:

On January 17, 2003, the Ad Hoc Telecommunications Users Committee, AT&T Corp., e-commerce & Telecommunications Users Group, Level 3 Communications, LLC, and WorldCom (collectively "Parties") jointly filed a motion seeking an extension of the deadline for filing comments and reply comments in the above-captioned proceeding. *See* Motion for Extension of Time, CC Docket Nos. 96-45, *et al.* (filed January 17, 2003). Specifically, the Parties requested that the dates for filing comments and replies in response to the Commission's *Second Further Notice of Proposed Rulemaking* ("*Second Further Notice*") be extended to February 28, 2003, and April 18, 2003, respectively. BellSouth supports the extension request and urges the Commission to grant the motion expeditiously.

BellSouth agrees that additional time to submit both comments and reply comments is necessary in order to provide meaningful and substantive input on the various proposals detailed in the *Second Further Notice*. Because the record in this proceeding is so voluminous, and some of the proposals at issue either have been modified from their original form or were only recently proposed, additional time is

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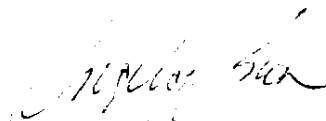
needed to understand fully and prepare a comprehensive analysis of the impact of each proposal.

In addition, an extension is warranted because of the overlapping universal service proceedings. Less than a week ago, reply comments were due on the Federal-State Joint Board's Recommended Decision regarding the methodology for determining high-cost universal service support for non-rural carriers. *See Comment Sought on the Recommended Decision of the Federal-State Joint Board on Universal Service Regarding the Non-Rural High-Cost Support Mechanism*, CC docket No. 96-45, DA 02-2916, *Public Notice* (rel. Nov. 5, 1996). Many of the same parties that participated in the non-rural high-cost support proceeding are also participating in the instant proceeding to reform the contribution and recovery mechanism. Because of the overlapping pleading cycles, the required personnel and subject matter experts have not had adequate time to analyze the *Second Further Notice*. An extension would allow these individuals time to provide significantly more substantive input to assist the Commission in its decisionmaking than the current filing schedule permits.

An extension of the reply comment deadline as requested in the motion is warranted as well. No doubt, there will be a large volume of comments filed. Over 50 parties submitted comments on the *Further Notice of Proposed Rulemaking* released last February in this proceeding, and it is likely that approximately the same number will participate in this round. The requested extension for filing reply comments is modest – two weeks added to the Commission's original 30-day window. BellSouth strongly believes that the quality and value of the reply comments would be greatly improved if commenters were given more time to review and analyze the initial pleadings.

The potential impact of revamping the universal service contribution methodology is significant; therefore, it is critical that the Commission afford parties adequate time to thoroughly review and analyze the various proposals along with evidence submitted by commenters. Accordingly, the Commission should grant the Parties' motion and extend the dates for filing comments and replies on the Commission's *Second Further Notice* to February 28, 2003, and April 18, 2003, respectively.

Sincerely,



Angela N. Brown

**CERTIFICATE OF SERVICE**

I do hereby certify that I have this 23<sup>rd</sup> day of **January** 2003 served the following parties to this action with a copy **of** the foregoing LETTER by electronic filing, electronic mail and/or by placing a copy of the same in the United States Mail, addressed to the parties listed below.

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Juanita H. Lee

+ VIA ELECTRONIC FILING  
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